

Additional Structure and Emphasis is Needed to Improve Milwaukee County's Recycling Efforts

September 2009

Committee on Finance and Audit

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To the Honorable Chairman
of the Board of Supervisors
of the County of Milwaukee

As directed by County Board Resolution [07-111(a)(c)], we have completed an audit of Milwaukee County's recycling program. Recycling is one of several areas addressed by legislation created by County Board action in July 2007 to reduce the County's environmental green print.

The report points out how the current decentralized recycling program results in varying degrees of adherence to good recycling principles. Centralizing many of the recycling activities currently performed autonomously at several County departments should provide greater consistency Countywide. This includes such things as contracting for recycling vendor service, maintaining records on the amount of recycling taking place, instituting best practices for all County locations, and educating employees on proper recycling procedures. The report also includes a recommendation to develop a strategic plan to provide uniformity in the manner in which Milwaukee County recycles.

A response from the Department of Transportation and Public Works is included as Exhibit 7. We appreciate the cooperation extended by staff from DTPW and all of the County departmental recycling coordinators during the course of this audit.

Please refer this report to the Committee on Finance and Audit.

Jerome J. Heer
Director of Audits

JJH/JAT/cah

Attachment

cc: Milwaukee County Board of Supervisors
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Summary

The only reference to recycling in the Green Print legislation enacted in 2007 directed the Parks Department “to place receptacles for recyclable materials in all Milwaukee County Parks where applicable.” Without specific direction related to all County locations and operations, the Green Print legislation has not had a significant impact on Milwaukee County recycling efforts. Eight departments that have primary responsibility for coordinating recycling activities throughout Milwaukee County have continued to work autonomously, performing their recycling efforts much as they had before the 2007 legislation.

Measuring Amount of Recyclables

The bulk of the waste items generated by Milwaukee County that are subject to recycling comes from paper-related products (white, mixed, cardboard, etc.), and commingled recyclables (glass, cans, and plastic). Weight is the measure generally used to record the amount of various items a business or institution has recycled. However, the County has not maintained records that would indicate the amount of recycling it has processed for a number of years. This data is needed to build baseline recycling data necessary for decision-making purposes, such as:

- Determining the number and size of dumpsters needed, and adjusting pick-up frequency.
- Evaluating options for expanding best practices from one County location to other County locations.
- Evaluating contracting options for participating in possible revenues generated from recycled materials.

Some County Locations Are Not Recycling Commingled Recyclables

The ability for both employees and visitors to properly separate recyclables from non-recyclable waste is critical to a well run recycling program. We observed locations where recycling bin placement was good (Airport, Coggs Center, Fleet Management, Zoo), as well as locations where greater accessibility to recycling bins may increase recycling (Parks, Behavioral Health Division, House of Correction, and Facilities Management locations). Clearer signage for bins would help improve compliance with State recycling laws. Requiring the use of new blue recycling bins for all County departments would also help. Only 35 blue bins had been requested as of August 18, 2009, of which nearly half (17) were requested by the District Attorney’s Office.

For an unknown number of years prior to May 2009, locations under the Facilities Management umbrella, including the Courthouse Complex and City Campus, operated with the understanding

that commingled recyclables could be combined with trash. Officials mistakenly believed the vendor picking up the trash had been separating recyclables from other waste items at its facility.

Hazardous and Other Waste Items

In general, County operations had procedures in place for proper disposal of hazardous waste material, such as batteries, used tires, florescent bulbs, motor oil, and many forms of electronic waste, such as computers and peripherals, monitors, copiers, etc.

No Contracts for Disposing Recyclables

There is no formal contract for hauling away the County's commingled recyclables (cans, bottles, glass) and most paper. It is unclear when the County last had a formal contract for recycling commingled items and paper. Prior to February 2007, the County used contractual price agreements to solicit competition for this service. From February 2007 through June 2009 there has not been competitive bidding for this service. Instead, invoices were paid through a series of centralized purchase orders in 2007 totaling \$7,593, and departmental purchase orders from 2008 through the most recent payment in April 2009 totaling \$11,442. The most recent invoice dated July 16, 2009 for \$4,749 covering the second quarter of 2009 has not yet been paid. The use of departmental purchase orders, which bypasses the competitive bids process, is not appropriate for this service given the total annual cost.

Minor problems were also noted with the invoices for pick-up of commingled recyclables and paper.

- The invoices included pick-up service to locations in which there had been no commingled recyclable dumpster.
- The current bills included monthly pick-up service at locations no longer directly a part of the County, such as the Museum and Transit.
- The charges attributable to other departments have not been cross-charged, such as the Airport, BHD, and the Zoo.

These problems can be addressed by working with the Procurement Division to solicit competitive bids for pick-up service. Selecting a vendor using the competitive bidding process should help get the best available price, and centralize the review of invoices with a person having full knowledge of the contract terms. We believe that centralizing other recycling contracts could also serve to ensure the County is getting the best possible price for recycling.

Centralized contracting could also provide the ability to extend the best practices of some recycling coordinators on a Countywide basis. For example, the Coggs Center earned about \$6,400 (about

\$100 per ton) on the sale of its paper to a local recycler, whereas all other County entities earn nothing from the vendor who hauls away paper at no cost to the County. This is accomplished by separating high quality white office paper from all other types of paper. However, we question the use of unpaid, non-County labor to shred sensitive confidential records as part of this process.

Survey of Other Jurisdictions

Based on feedback from five jurisdictions we surveyed, plus jurisdictions we researched on the internet that are considered to have well run recycling operations, we identified several areas where Milwaukee County can improve its recycling program. All programs reviewed noted the importance of having recycling bins at all strategic locations. The most prevalent theme that came from our research and surveys was the need for establishing a strong recycling environment within the organization. The report notes how education and communication are the backbone to improved recycling. The Sustainability & Environmental Engineer for Milwaukee County has already addressed some of these points, such as creating a newsletter and County web site.

Strategic Planning

There is a great deal of diversity in the manner in which Milwaukee County government recycles at major County locations. We believe the Sustainability & Environmental Engineer needs to take the lead to provide better consistency among the recycling locations, implement best practices, ensure all recycling issues are addressed, and provide current updates for changes that may occur in the future. Developing Countywide policies, procedures and a strategic plan for addressing current and future recycling needs would help provide the necessary framework for the County recycling program.

A management response from the Milwaukee County Department of Transportation and Public Works is included as **Exhibit 7**. We wish to acknowledge the cooperation of the Department of Transportation and Public Works and all County department recycling coordinators during the course of this audit.

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Background

History of Milwaukee County Recycling

Recycling in Milwaukee County had its formal roots in 1989, when the County Board adopted a resolution (File No. 89-476) directing the Department of Public Works to conduct a feasibility study to develop a waste recycling program for all Milwaukee County facilities and departments. That report, issued in January 1990, stated there was a growing concern among Milwaukee County residents, public officials and County employees for a comprehensive solid waste management program.

That same year, an Interdepartmental Recycling Committee was established. In 1991, the County entered into a one-year contract with Peltz Corporation for the pick-up of the County's recyclables. Records indicate that the recycling program yielded 221.5 tons of recycled materials in 1991, 300 tons in 1992, and 340 tons in 1993.

The County extended its contract with Peltz until 2001. Waste Management Recycle America currently is the vendor hauling most of the County's paper and commingled recyclables (cans, plastic, glass).

Wisconsin state law banned certain items from landfills beginning in the 1990's. Banned in 1991 were lead acid batteries, major appliances, and waste oils. The list grew in 1993 to include yard waste. Beginning in 1995, additional items were banned:

- Office paper, newspapers, magazines, and corrugated cardboard
- Plastic, glass, steel, bi-metal, and aluminum containers
- Florescent tubes
- Foam polystyrene packaging
- Waste tires

State law also prohibits the disposal of electronic waste and other hazardous waste products into landfills. The types of waste products Milwaukee County typically generates include such items as computers and related peripherals, copiers, and florescent light bulbs.

Green Print Initiative

In July 2007, the County Board created an environmental and conservation "Green Print" initiative for Milwaukee County (File No. 07-111). The Green Print legislation contained five major initiatives for helping reduce overall energy costs, briefly summarized as follows:

- **Performance Contracting/Construction** – Retrofitting 20% of all County public buildings annually with high performance energy efficient technology, plus designing future construction projects to meet new Leadership in Energy and Environment Design (LEED) standards.
- **Resource Management** – Reduce storm water runoff from County facilities; use “gray water” for applications where treated water may not be needed; place receptacles for recyclables in County parks; and return park land not actively used by the public to native grassland and prairie reserve areas.
- **Alternative Energy** – Use renewable energy sources such as wind and solar power for County facilities where applicable; purchase fleet vehicles powered by cleaner energy sources, such as bio-fuels, hybrids and plug-in hybrids, where applicable; and seek grant funding that focuses on energy efficiency and renewable energy.
- **Education** – Improve staff awareness of green initiatives, encourage education efforts so staff can implement green initiatives at work and home; create the position of Director of Sustainability (now called the Sustainability & Environmental Engineer) to oversee current and future energy efficient and eco-friendly initiatives, and to help departments comply with Green Print initiatives; and require all County departments to perform an internal audit of ways to improve energy efficiency.
- **Procurement** – Purchase environmentally preferred products where applicable; and continue to replace all traffic signals and signs with LED (light-emitting diode) signals during regularly scheduled maintenance.

In 2008, the County Board created the Green Print Workgroup, consisting of representatives from the Department of Transportation and Public Works, Parks Recreation and Culture, the Department of Administrative Services, and County Board staff. It was charged with updating the County Board quarterly on the progress of implementing the County’s Green Print initiatives. The workgroup’s first report, dated March 23, 2009, included a status update of some recycling initiatives within the County. At the April 2009 Parks, Energy and Environment Committee where it was discussed, the Department of Audit was directed to perform an audit of Milwaukee County’s recycling program. It requested that the audit identify the amounts and types of recycling currently being done and compare the County’s program with recycling programs in other cities and/or counties within the region and evaluate Milwaukee County’s recycling contracts.

Section 1: Milwaukee County’s decentralized recycling program results in varying degrees of adherence to good recycling principles.

Without specific direction relating to all County locations and operations, the Green Print legislation has not had a significant impact on Milwaukee County recycling efforts.

The only reference to recycling in the Green Print legislation enacted in 2007 directed the Parks Department “to place receptacles for recyclable materials in all Milwaukee County Parks where applicable.” Without specific direction related to all County locations and operations, the Green Print legislation has not had a significant impact on Milwaukee County recycling efforts.

There are eight County departments (see **Table 1**) that have primary responsibility for coordinating recycling activities throughout Milwaukee County. Within those departments, selected individuals have been assigned the responsibility of handling various recycling and waste hauling duties. With few exceptions, these individuals (which we refer to in this report as recycling coordinators), have continued to work autonomously, performing their recycling efforts much as they had before the 2007 legislation.

Table 1
Departments Primarily Responsible for
Recycling at County Facilities

<u>Oversight Department</u>	<u>County Facility</u>
Airport	All buildings within the Airport
Behavioral Health Division	Mental Health Complex
DHHS - Marcia P. Coggs Center	1220 W. Vliet 3700 W. Michigan (inactive records & volunteer center)
Facilities Management:	Courthouse Complex City Campus Community Correction Center Children's Court Center Child & Adolescent Treatment Center Research Park
Fleet Management Division:	Fleet Management Highway Maintenance
House of Correction	Main facility in Franklin
Parks	All Parks facilities
Zoo	County Zoo

Source: Department of Audit based on interviews with Sustainability & Environmental Engineer and other County recycling coordinators.

The County has not maintained records that would indicate the amount of recycling it has processed for a number of years.

The bulk of the waste items generated by Milwaukee County that are subject to recycling comes from paper-related products and commingled recyclables.

Measuring Amount of Recyclables

Weight is the measure generally used to record the amount of various items a business or institution has recycled. However, the County has not maintained records that would indicate the amount of recycling it has processed for a number of years. The only documentation we found of the weight of Milwaukee County's recycled paper and commingled recyclables was from the mid 1990's.

The bulk of the waste items generated by Milwaukee County that are subject to recycling comes from paper-related products (white, mixed, cardboard, etc.), and commingled recyclables (glass, cans, and plastic). Since January 2009, the vendor responsible for hauling all commingled recyclables and nearly all

of the paper has been itemizing all pick-up locations. This includes an estimate of the amount of paper products picked up for each paper bin location. However, the detailed invoices do not include the weight of commingled recyclables associated with each location. Further, the vendor could not provide detailed records for prior years showing weights for paper or commingled recyclables.

Jurisdictions we spoke with work with waste haulers to provide actual weights of their recyclables, or obtain reasonable estimates.

Jurisdictions we spoke with indicated they work with waste haulers to provide actual weights of their recyclables, or reasonable estimates if taking actual measurements is not feasible. Estimates are based on an analysis of an institution's recycled waste stream (composition of recyclables) and how much of the dumpster is filled at the pick-up time.

Milwaukee County needs to work with the recycled waste hauler to provide meaningful weight data on the amount of Countywide recycling. This data is needed to build baseline recycling data necessary for decision-making purposes, such as:

- Determining the number and size of dumpsters needed, and adjusting pick-up frequency.
- Evaluating options for expanding best practices in one County location to other County locations.
- Evaluating contracting options for participating in possible revenues generated from recycled materials.

The Green Print legislation does not assign specific responsibility for Countywide recycling efforts to any single department.

The Green Print legislation does not assign specific responsibility for Countywide recycling efforts to any single department. However, the placement of the Sustainability & Environmental Engineer position in DTPW, as well as the dispersal of DTPW facilities throughout the County, make it a logical place to coordinate Milwaukee County recycling efforts.

To provide the County with meaningful data for evaluating its recycling performance, we recommend that the Department of Transportation and Public Works:

1. *Work with the recycling vendor and the County's recycling coordinators to document actual weight or a reasonable estimate of the County's recyclables.*

Observations and interviews helped bridge the information gap on the extent of Milwaukee County's recycling efforts. Observations at major County locations, confirmed by interviews, identified significant variations in the County's recycling efforts.

Some Locations Are Not Recycling Commingled Recyclables

Several County locations have not been recycling commingled recyclables (cans, glass, plastic). The reasons may vary as noted below, but the result is the same - - commingled recyclables have been, or continue to be, treated the same as waste. They end up in area landfills, a violation of State law.

Availability of Recycling Bins

The ability for both employees and visitors to properly separate recyclables from non-recyclable waste is critical to a well run recycling program. Without separate recycling bins, commingled recyclables will likely get discarded in the trash bin.

Parks Department

Most Parks locations do not have separate recycling receptacles. Only special event contracts require visitors to separate recyclable materials from other waste. Rental contracts for picnic areas and pavilions have no such requirement. Without separate recycling bins, recyclables are often thrown in the existing waste bins (see **Exhibit 2** for an example noted at Humboldt Park).

The Parks Department has ramped up its recycling efforts.

However, the Parks Department has ramped up its recycling efforts with some new programs to strengthen its recycling, primarily for people using the Parks system. For example, the Parks recycling coordinator is working with the City of Milwaukee

to establish six regional drop-off centers in the Parks. Parks is also adding 11 other recycling collection points (large dumpsters) throughout the Parks system. Parks also purchased 100 portable recycling units for Parks-sponsored special events, which are available for rental to special event partners.

BHD and House of Correction

There were recycling dumpsters at Behavioral Health Division and the House of Correction, which indicate some degree of recycling was occurring. However, there were no recycling bins for staff or visitors at either location, indicating that any recycling that was being done was due primarily to the kitchen or other internal operations at both locations.

Facilities Management Locations

The Courthouse Complex and other locations served by Facilities Management had sporadic use of recycling bins.

The Courthouse Complex and other locations served by Facilities Management had sporadic use of recycling bins for employees and the public, especially in general traffic areas. We heard complaints concerning recycling from lawyers at both the Courthouse and the Children's Court Center. One commented that none of the courts had recycling bins. At the Children's Court Center, concern was voiced when lawyers and judges watched recyclable items they had separated on their own being tossed into a waste dumpster outside their windows.

Signage was also a problem noted at the Courthouse. Bins apparently for waste had no signage indicating what they were for (see **Exhibit 3**). We observed one visitor about to discard a plastic bottle into one such bin, but upon seeing waste in it, put the bottle back into her purse.

Other bins gave patrons mixed signals as to what the bin was for. Jury Management had a bin indicating that both waste and plastic should be discarded in it (see **Exhibit 4**). Housekeeping staff we talked to indicated they do not sort out recyclables that had been commingled with trash. Clearer signage on all bins,

including recycling bins, would help improve compliance with State recycling laws.

The best location for consistently providing recycling bins at all locations where trash bins were also present was the Airport.

Departments Where Recycling Bins Were Readily Available

Perhaps the best location for consistently providing recycling bins next to trash bins was the Airport. Nearly every trash collection point at the Airport had three separate collection bins, one for bottles and cans, one for newspaper, and one for trash (see **Exhibit 5**).

The Zoo and Coggs Center also made extensive use of recycling bins.

The Zoo and Coggs Center also made extensive use of recycling bins, though recycling bins were not present for all trash collection points at the Zoo. At the Coggs Center we noted several multi-purpose recycling bins with separate compartments for glass, paper, plastic and cans. However, the signage of some of them needed replacement. The Coggs Center also had unmarked barrels, apparently for trash.

Fleet Management, due to the nature of its operations, had recycling bins available for staff to use, primarily in the garage areas where they perform their work.

Facilities Management officials believed the vendor picking up the trash was separating recyclables from other waste items at its facility.

Misunderstanding of Service Provided

For an unknown number of years prior to May 2009, locations under the Facilities Management umbrella, including the Courthouse Complex and City Campus, operated with the understanding that commingled recyclables could be combined with trash. Officials mistakenly believed the vendor picking up the trash was separating recyclables from other waste items at its facility. However, this was not the case.

Officials moved to correct the situation in May 2009. Currently, most Facilities Management locations have dumpsters for commingled recyclables.

Recently, many departments at the Courthouse began using new blue recycling bins in their employee break areas.

The need for dumpsters and clearly marked recycling bins at all major trash collection points throughout County government is essential to improving Milwaukee County's recycling efforts.

Blue Recycling Bins for Employees

Recently, many departments at the Courthouse began using new blue recycling bins for commingled recyclables in their employee break areas. These blue bins, purchased by Facilities Management, were offered to department heads in a memo dated July 1, 2009. However, they were offered only to departments in its facilities, and their use was not mandatory. As a result, participation was not universal. Only 35 bins have been requested as of August 14, 2009, of which nearly half (17) were requested by the District Attorney's Office.

The need for dumpsters and clearly marked recycling bins at all major trash collection points throughout County government is essential to improving Milwaukee County's recycling efforts. We recognize there could be a cost associated with this initiative. However, compliance with Wisconsin's recycling laws is not voluntary. For most of the items that are not recycled, anyone who violates the law may be required to forfeit \$50 for a first violation, \$200 for a second violation, and not more than \$2,000 for a third or subsequent violations.

Not only will the availability of recycling bins reduce the amount of recyclables being discarded as waste, proper recycling will save valuable natural resources and improve the County's compliance with the law. We recommend that the Department of Transportation and Public Works:

2. *Work with recycling coordinators to provide clearly marked recycling bins for all major trash collection points.*
3. *To improve County employee recycling, provide recycling bins for all County departments, and require their use.*
4. *Work with recycling coordinators to ensure all County locations have the necessary recycling dumpsters to collect commingled recyclables.*

Hazardous and Other Waste Items

County operations generate other types of recyclables that cannot be placed into landfills. Some are not hazardous, such as scrap metals and construction materials. For example, we noted that the Airport in particular had a process in place to recycle most of its construction waste, due primarily to its large storage area.

Other recyclables are hazardous in nature. This includes batteries, used tires, florescent bulbs, motor oil, and many forms of electronic waste, such as computers and peripherals, monitors, copiers, etc.

All major County government locations that generate hazardous waste material had procedures in place for its proper disposal.

From our interviews and observations, we noted that all major County government locations that generate hazardous waste material had procedures in place for its proper disposal. The lone exception may be the handling of small batteries. Though many County locations stated they have collection points for used batteries, employees may not be aware of the location.

We recommend that the Department of Transportation and Public Works:

5. *Work with the recycling coordinators to establish and communicate recycling procedures relating to disposal of batteries.*

Section 2: Milwaukee County's recycling program would benefit from centralized contracting.

No Contract for Commingled Recyclables Service

There is no formal contract for hauling away the County's commingled recyclables (cans, bottles, glass). Prior to February 2007, the County used contractual price agreements to solicit competition for this service. From February 2007 through June 2009 there has not been competitive bidding for this service. Instead, invoices were paid through a series of centralized purchase orders in 2007 totaling \$7,593, and departmental purchase orders from 2008 through the most recent payment in April 2009 totaling \$11,442. The most recent invoice dated July 16, 2009 for \$4,749 covering the second quarter of 2009 has not yet been paid.

Centralized purchase orders are generally for one-time purchases of goods and services ranging from \$2,000 to \$10,000, and may not necessarily result in obtaining a competitive bid. In this case, they were used to essentially extend the previous price agreement.

Invoices Paid with Departmental Purchase Orders

The use of departmental purchase orders is of greater concern. According to s. 32.27 of County Ordinances, departments can make purchases not to exceed \$2,000. However, this authority "...shall not be used to circumvent bulk purchases of any item by repeated purchases in the amounts of two thousand dollars (\$2,000) or less," a practice commonly referred to as 'chaining.' Since January 2008, it appears that payments for commingled recycling service were chained, effectively avoiding Procurement Division interaction to obtain competitive bids for the service.

Invoices for hauling away commingled recyclables for all County locations during this period were sent to Facilities Management

for payment. Until 2009, the invoices for this period showed only total amounts due. They had no details showing all the County pick-up points and the associated charges to support the summary bill. Without the details to support the bill, it is unclear what degree of scrutiny had been given to those invoices.

Review of Invoices

A review of the invoices received in 2009 disclosed the following additional problems:

Facilities Management officials identified charges for pick-up service at locations in which there had been no commingled recyclables dumpster.

- The invoices included pick-up service to locations in which there had been no commingled recyclables dumpster. This issue was identified by Facilities Management officials when invoices began providing additional detail. The overbilled amount is not large, estimated at \$616 for March through June 2009 (we could not find an invoice for January and February 2009). Also, without detailed invoices prior to 2009, we could not confirm how long this has occurred.
- The current bills included monthly pick-up service at locations no longer directly a part of the County, such as the Museum and Transit. The County is being billed \$70 per month each for this service, or a total of \$1,680 annually for both locations.
- The charges attributable to other departments have not been cross-charged, such as the Airport, BHD, and the Zoo.

Need to Solicit Competitive Bids

Selecting a vendor using the competitive bidding process should help get the best available price.

These problems can be addressed by soliciting competitive bids for pick-up service. Selecting a vendor using the competitive bidding process should help get the best available price, and centralize the review of invoices with a person having full knowledge of the contract terms.

Formal contracting for removal of recyclables for all County locations, especially for extended periods of time, could also improve working relationships with the vendors, which in turn could result in better personal service. Discussions with recycling vendors indicated that their ability to better serve the County's recycling needs would be enhanced if longer term contracts could be initiated. The concern was that the vendor

would invest considerable time and resources working with the County to improve the manner in which the County recycles, only to potentially lose the contract the following year.

As the Sustainability & Environmental Engineer more fully assumes control of Milwaukee County's recycling efforts, it should become the focal point for all interaction with recycling vendors. We recommend that the Department of Transportation and Public Works:

6. *Work with the Procurement Division to initiate a competitive bid process for the Countywide hauling of commingled recyclables.*
7. *Have the Sustainability & Environmental Engineer be responsible for approving related invoices.*
8. *Cross-charge departments and other entities for pick-up services provided.*
9. *Request detailed invoices for prior years to determine the extent to which the County has been billed improperly for pick-up service.*

We believe that centralizing other recycling contracts could also serve to ensure the County is getting the best possible price for recycling.

We believe that centralizing other recycling contracts could also serve to ensure the County is getting the best possible price for recycling. Centralized contracting could also provide the ability to extend the best practices of some recycling coordinators on a Countywide basis. In particular is the manner in which paper is recycled.

No Contract for Paper Recycling

We noted that all major County locations have a process in place for employees to keep paper products separate from all other recyclable items and waste. Large rolling bins are placed at designated locations on floors for employees to deposit their paper products (office paper, newspaper, magazines, cardboard, etc.). For most County locations, these bins are subsequently emptied by the recycling vendor and hauled away at no cost to

the County, but also without earning any revenue. Of concern was that we could find no contract formalizing this practice.

Except as noted below, County employees commingle most types of paper products. While this may be convenient, a little effort in keeping certain qualities of paper separate on the front end have provided a revenue stream in some instances.

The Coggs Center has a process for separating higher quality office white paper from all other types of paper, and selling it to a local paper recycler.

Coggs Center

The Coggs Center has a process for separating higher quality office white paper from all other types of paper, and selling it to a local paper recycler. According to Coggs Center staff, it received about \$6,400 for 125,100 pounds of paper, equating to about \$100 per ton.

However, it uses unpaid, non-County personnel to manually separate the paper as needed, and to shred white paper that may have confidential personal identity information. The Coggs Center works with Justice 2000 and other agencies to offer community service as an alternative to incarceration or payment of fines. This practice poses an unnecessary risk, given the access to sensitive data. Other departments that shred confidential records, including the Department of Audit, generally pay a fee to a shredding vendor for the service. We were told by the BHD recycling coordinator that it had considered having their confidential files shred by the Coggs Center, but have not yet done so because of concerns over possible risks associated with transporting sensitive files if an accident should occur.

House of Correction

The House of Correction donates its cardboard to the Hunger Task Force, which has a presence at HOC with the farm and fish hatchery operations. It is not known how much cardboard is donated, nor the amount of revenue it makes from the cardboard sales.

The practice of sorting white paper from other, less valuable types is something that could have benefits Countywide. However, certain factors need to be considered before that option is initiated, such as:

- How much recyclable white paper does the County generate? With no reliable data on the amount of paper the County recycles, or what percentage is of the more valuable variety, it is unknown how much revenue could be received if this practice were extended Countywide.
- How much effort is needed to separate the different qualities of paper? For the Coggs Center, the use of unpaid labor reduces the cost of sorting the more valuable paper. However, proper sorting at the source by employees could mitigate the need for this sorting. The question then becomes how much would it cost for additional bins to be provided to allow white paper to be kept separate from all other types of paper.
- What are the fiscal effects of a fluctuating recycled paper market? As of August 2009, the wholesale price for varying degrees of high quality white paper ranged from \$115–\$200 per ton, compared to mixed paper at \$40–\$45 per ton.

Concept of Paper Recycling for Cash Not New

This issue is not new. Although records are sketchy, it appears that the County either had begun separating paper qualities, or was strongly considering the option, around 1994. However, the decision was reversed for unknown reasons, with only mixed papers being recycled.

The concept of sharing in the revenue associated with paper recycling is also not new. A letter from the Deputy Director of Public Works to the County Executive, dated May 8, 1997, indicates that the County received \$16.50 per ton and \$1.00 per ton for mixed paper under the recycling contract at the time. It should be noted that there were pick-up charges at that time that would have offset these revenues. We were unable to determine if the contract in place at that time was a better deal than the current practice of no-cost pick-up but also no revenue. However, based on the Coggs Center results, it appears that

**Waukesha County
shares in the
revenues earned by
its recycling hauler
for mixed paper and
for bottles and cans.**

current arrangement for the rest of the County may not be in the County's best interest.

Survey of Other Jurisdictions

We also surveyed other jurisdictions concerning their recycling programs. While the number of respondents was low, some positive feedback was generated. For example, Waukesha County shares in the revenues earned by its recycling hauler for mixed paper and for bottles and cans. Similar revenue streams were reported by other jurisdictions that we researched on the internet, such as the State of Tennessee, further demonstrating that making money on recycled materials is possible.

The County needs better information on the amounts and quality of paper it recycles to evaluate the feasibility of extending the Coggs Center efforts Countywide. However, we believe that the risk associated with using unpaid labor to shred sensitive documents exceeds the benefits derived. Thus, it should not be considered when determining the best way to recycle paper Countywide. We recommend that the Department of Transportation and Public Works:

- 10. Evaluate the economic feasibility of separating high quality white paper from other lower quality paper on a Countywide basis.*
- 11. Work with the Department of Human Services to develop alternative tasks for unpaid, non-County staff that currently shred confidential files for recycling purposes.*

Scrap Sales

Other recyclable items generate revenue across the County. County financial records for 2008 show scrap sales of over \$91,400. This consists primarily of sales of scrap metals that come from repair and maintenance projects by Parks, House of Corrections, Highway Maintenance, Fleet Management, Facilities Management and the Zoo. This also includes sales of used motor oil, which generated over \$5,000 in 2008.

We did not fully review these areas to confirm the manner in which these sales were conducted. Interviews indicated in most cases that the recycling coordinator simply shopped around for a fair price from a reliable vendor. As the Sustainability & Environmental Engineer becomes more involved in centralizing the contracting of other recyclables noted in this report, this may be another area suitable for centralization. Doing so could provide consistency and better assurance that the best available price is received for all County recyclables. In addition, it would help centralize the data collection on these recyclables to show the County's progress in recycling over time.

Section 3: Milwaukee County can improve its recycling results with better education, communication and strategic planning.

We identified several areas where Milwaukee County can improve its recycling program.

We were asked to assess how well Milwaukee County is doing with its recycling program compared to other jurisdictions. We received feedback from five jurisdictions regarding their recycling programs. In addition, we researched the internet for jurisdictions considered to have well run recycling programs. We identified several areas where Milwaukee County can improve its recycling program.

For example, all programs we reviewed noted the importance of having recycling bins at all strategic locations, a problem previously noted in this report. Several other good ideas that Milwaukee County could adopt to improve its recycling function are noted below.

The most prevalent theme that came from our research and surveys was the need for establishing a strong recycling environment within the organization.

Perhaps the most prevalent theme that came from our research and surveys was the need for establishing a strong recycling environment within the organization. This is not to say that this does not already exist at some County locations. However, as many of the issues in this report indicate, some locations need to improve their approach to recycling more than others, including:

- Cans, plastics and glass were not even being recycled at several high traffic locations until recently.
- Very little commingled recycling volume was noted at some locations.
- Inconsistent placement of recycling bins next to waste bins resulted in recyclables being discarded as waste.
- The use of newly issued blue recycling bins for commingled recyclables was not mandated, thus some departments chose not to request them.

Interviews indicated that a culture of recycling within the County is not universal.

In addition, interviews indicated that a culture of recycling within the County is not universal. The following subsections discuss some ideas to provide a more consistent, effective and efficient approach to recycling.

Education

In talking with recycling vendors, we found that businesses with the best reputations for recycling were those that educated their employees on recycling expectations, and provide the tools needed to do the job. That included placing recycling bins wherever waste bins were located.

It also included educating staff on the recycling process. Showing employees that current technology is able to sort cans, bottles, plastics and even paper, though commingled in the same recycling bin, helps improve employee participation. Vendors we spoke with indicated a willingness to provide free educational seminars for County managers and staff.

Employees also need to be educated on such things as:

- State law regarding what cannot be thrown into landfills.
- The County's environmental policy as stated in the Green Print legislation, in the form of a mission statement committing the County to recycling and preventing waste.
- Policies and procedures relating to recycling. This could include discussing how to reduce and recycle waste as part of their job duties. It could also include a specific listing of recyclable items and their methods of proper disposal. Since recyclable items and procedures have changed over the years, educating employees on current procedures is important.

Communication

Good communication is the vehicle for keeping staff and visitors current on recycling efforts. Forms of communication include:

- A web page discussing various recycling topics, issues, concerns, with links to other web sites or perhaps training videos. The Sustainability & Environmental Engineer has

created a Green Print web page accessible through the Milwaukee County internet portal. It does a good job of informing website visitors of the County's Green Print Initiative. However, employees may not know of its existence. It is not accessible from the County's intranet portal, where most County employee news is located.

- Newsletters on Recycling. The Sustainability & Environmental Engineer has created the Green *Print* newsletter, with a first edition in June 2009 (see **Exhibit 6**). Although there was no mention of the County's recycling program, the framework is in place to do so in future issues.
- E-mails and memos to all employees. Though the initial Green *Print* newsletter was supposed to have been sent to all employees, it may not have reached everyone.
- Posters or other signage. We noted few posters concerning recycling in our visits throughout the County for staff or visitors.

It is important to keep communication active.

It is important to keep communication active. For instance, ideas could be solicited from employees at all levels. Contests or incentives could be created to encourage recycling. Recycling challenges could be initiated to see which department recycles the most, or a waste prevention challenge to encourage new ideas for preventing waste.

Employees should be kept informed of special recycling events sponsored by the County.

Employees should also be kept informed of special recycling events sponsored by the County. We learned of several recycling events and programs in which the County is involved:

- A "Clean Sweep" event at the Zoo to encourage visitors to recycle their old cell phones.
- A event sponsored by Boerner Botanical Gardens encouraging visitors to bring in their used plastic pots for recycling. According to staff, last year's event netted 21.5 tons of recyclable plastics.
- As noted previously, Parks is working on three programs to increase recycling Countywide.

We noted several comments from staff concerning the need to improve the communication on recycling news and events. This

would indicate that the web site and newsletters issued thus far may not have been as effective as intended.

Strategic Planning

As shown in this report, there is a great deal of diversity in the manner in which Milwaukee County government recycles at major County locations. This is no reflection on the efforts to date by the Sustainability & Environmental Engineer. Until recently, he has retained some of his former responsibilities due to position cutbacks. Further, a wide range of other Green Print responsibilities has been assigned to his position in addition to recycling.

The Sustainability & Environmental Engineer position needs to take the lead to provide uniformity in the manner in which Milwaukee County government performs its recycling operations.

However, we believe this position needs to take the lead to provide uniformity in the manner in which Milwaukee County government performs its recycling operations. It is not imperative that the position take over all recycling activities. But it should be used to provide better consistency among the recycling locations, ensure all recycling issues are addressed, and provide current updates for changes that may occur in the future. In general, this position needs to become the face of Milwaukee County's recycling campaign and ensure it is maximizing its recycling efforts.

This will undoubtedly take time for the position to make an imprint on the County's recycling culture. However, addressing problems noted in this report could become the springboard to developing Countywide policies, procedures and a strategic plan for addressing current and future recycling needs. The best practices of not only other jurisdictions as noted in this report, but also select County locations that have taken the lead in some areas, could be integrated into such a plan.

On a higher level, the strategic plan could also include an overarching environmental operating policy that includes reducing purchases by reusing materials where possible, and

buying environmentally preferable products and services in addition to recycling waste material, similar to the State of Tennessee.

We recommend that the Department of Transportation and Public Works:

- 12. Develop, for County Board consideration, an environmental policy or mission statement committing Milwaukee County to recycling and preventing waste.*
- 13. Develop, for County Board consideration, a strategic County-wide recycling plan, complete with policies and procedures for required management and employee involvement, to provide consistency in the manner in which recyclable items are handled for all County locations.*

Audit Scope

The County Board authorized and directed the Director of Audits [File No. 07-111 (a)(c)] to perform an audit of Milwaukee County's recycling program. The County Board directed that the audit identify the amounts and types of recycling currently being done, compare the County's program with recycling programs in other cities and/or counties within the region, and evaluate Milwaukee County's recycling contracts. This audit was conducted under the standards set forth in the United States Government Accountability Office *Government Auditing Standards (2007 Revision)*. We limited our review to the areas specified in this Scope Section. During the course of the audit, we:

- Reviewed 2005 through 2009 Adopted Milwaukee County Budgets, County Board and Board committee minutes to identify issues, concerns, recommendations, and County Board Resolutions relating to Milwaukee County's recycling efforts.
- Reviewed applicable County Ordinances and Administrative Manual sections, State Statutes and Administrative Code, and Federal regulations and rules sections to ensure compliance with federal, state, and local laws relating to the County's responsibilities for recycling.
- Reviewed previous audit reports, applicable recycling contracts, County policies and procedures related to recycling, internal forms, correspondence and memos, and reports relating to the recycling program.
- Conducted internet research to identify studies and audits that provided useful background information, relevant industry standards, performance measures, best practices and recommendations concerning recycling.
- Interviewed the Sustainability & Environmental Engineer and other County department staff responsible for operating recycling programs at major County locations.
- Reviewed the process used to contract for recycling services.
- Interviewed representatives of vendors responsible for transporting and processing recyclable materials.
- Observed the process for separating recycled materials by type (aluminum cans, steel cans, plastic containers, paper, etc.) at vendor's recycling center.
- Observed the process for disposing of non-recyclable materials into landfills.
- Toured County buildings to observe the process used to keep recyclable materials separate from other waste material.
- Interviewed County staff on recycling procedures and the availability of recycling bins.

**Photograph of Unmarked Bin
At Courthouse**



**Photograph of Bin
At Jury Management**



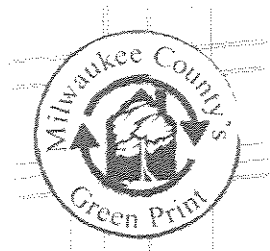
**Photograph of Waste & Recycling Bins
At General Mitchell International Airport**



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The Green Print

June, 2009



Milwaukee County's Green Print

In 2007 Milwaukee County's Board of Supervisors and County Executive approved a Green Print resolution, intended to improve the quality of life of County citizens through a plan to conserve natural resources and use energy more efficiently at County facilities.

The Green Print outlines sixteen energy and conservation initiatives, including retrofitting public buildings to be more energy efficient, implementing sustainable design practices in County-funded construction projects, reducing storm water runoff, improving recycling in County facilities, and pursuing renewable energy technologies when appropriate.

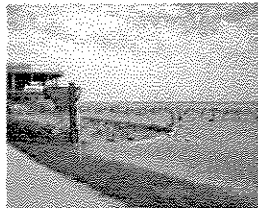
To learn more about the Green Print Initiatives, go to

www.county.milwaukee.gov/DPW/MilwaukeeCountysgreenPrint.htm



Spotlight on County Projects

Recent upgrades to more energy-efficient lighting and heating systems at the Courthouse, Coggs Center, Zoo, and Criminal Justice Facility will significantly reduce the amount of electricity consumed at these buildings. The projected energy reduction from these conservation measures translates into utility costs being reduced by more than \$600,000 per year. The costs of the upgrades were partly offset through grants from Wisconsin's Focus On Energy program.



Bio-infiltration systems and rain gardens were installed at Bradford Beach last spring to infiltrate and treat storm water. These systems are designed to prevent polluted storm water from getting on to the beach area and into Lake Michigan. Similar systems are being constructed at McKinley Beach this spring.

LED lights that require only a fraction of the electricity previously required are being installed at all County-owned traffic signals this year.

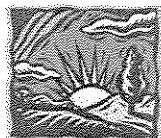
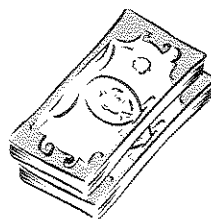
Conserving Resources and \$: At Home and Work

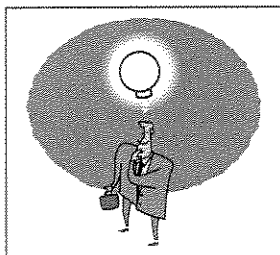
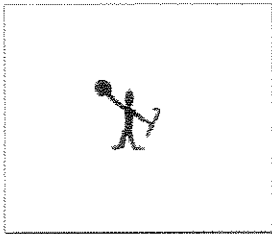
Interested in saving money and doing something beneficial to the environment at the same time? Simple measures such as the following could save you hundreds of dollars each year:

- Replace your manual thermostats with programmable versions
- Switch light bulbs and ballasts to the more efficient fluorescents
- Wash all laundry in cold water when fabrics will allow
- Install low flow shower heads
- Bring reusable bags to the grocery
- Close shades and drapes on south or west-facing windows to reduce solar heat gain
- Shade your air conditioning unit
- Replace air filters in furnace and air conditioner regularly
- Turn off office lights when areas are unoccupied.
- Turn off your computer over night.

For more ideas, go to

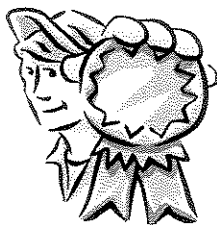
<http://www.focusonenergy.com/residential/>





*Ideas? Suggestions?
Contact Steve Keith
via Lotus Notes email
or at 278-4355*

*Did you know?
The average MCTS
bus rider saves
\$1,400 per year and
generates half the
air emissions that
would be produced
from driving to work.*



Spotlight on Staff

Arnold Freeman, an architect with the DTPW, is an avid cyclist and rides his bike to work as weather permits. He also participates in an automobile sharing program. "I've found that over the past 2-3 years, a combination of biking, taking the bus, and being a member of a car-sharing plan (Zipcar) works perfectly for me", and notes that "perhaps in small way I'm helping the recovery of an ailing ecosystem."

Bright Ideas Needed Yours

Engaging employees is essential to the process of continuous improvement. To tap the ideas of staff from the ground up, some departments have created Green Committees to identify and promote policies and practices that help to conserve our natural resources through actions such as reduced consumption and reuse.

Alternative Fuel Vehicles and Hybrids

Gas prices are creeping back up but so are the number of hybrid cars on the road. According to RL Polk & Co, sales of hybrids increased 38% in 2008.

Parks recently replaced three fleet cars with more fuel-efficient Chevy Malibu and Ford Escape hybrids. Sue Black, Parks Director, states "not only are the hybrids great for the department for cost savings, they are a symbol to the community that we are responsible to keep our environment healthy."

Your Community

Have you checked lately to see what your community has been doing to become more sustainable? Many are taking action. Examples include Wauwatosa's rain garden fair and Bayside's rain barrel program. Contact your city or town to learn more.

To date, committees have been established at the Zoo, Milwaukee Public Museum, Parks Department, and DTPW A&E.

Got ideas or suggestions for sustainable actions? If so, please forward them to Steve at stevan.keith@milwcnty.com.

Going...going ...gone: Federal tax credits of up to \$3,400 are available for many hybrids, but some cars like the Toyota Prius have sold over 60,000 this year and so their credit has expired.

GM plans to market their first "plug-in" hybrid, the Chevy Volt, in 2010. The Volt is expected to travel 40 miles on a charge and can be recharged for <\$1.00 using a standard electrical outlet. It has a 1.4 L flex-fuel engine for an additional 400 miles when the battery runs out of charge.

Grants & Awards

Milwaukee County Zoo was awarded a \$145,000 grant from the MMSD for stormwater recycling and rain gardens. One project will capture rainwater from the roofs of two buildings near Monkey Island and use the water for washing down the area. Rain gardens will capture water from the wash down operations and drain it into the ground.

Boerner Botanical Gardens also received a \$100,000 grant from the MMSD for a project that will harvest rainfall from the visitor's center roof and use it to water nearby gardens.

Bradford Beach storm water controls project was awarded an American Public Works Association Project of the Year Award for 2009.

Please print only if necessary. Consuming less saves \$ and is beneficial to our environment. Reduce-Recycle-Reuse

MILWAUKEE COUNTY
Inter-Office Communication

Exhibit 7

Date: August 31, 2009

To: Jerome J. Heer, Director of Audits

From: Jack H. Takerian, Interim Director, Transportation and Public Works

Subject: Milwaukee County Transportation and Public Works Response
Audit of County Recycling Program

The Department of Transportation and Public Works (DTPW) appreciates the review conducted by the Milwaukee County Department of Audit, and has provided its comments on the County Recycling Program. DTPW staff has made every effort to provide Audit staff with quick and accurate information for this review

DTPW looks forward to the standardization that will be brought about by this review. Upon learning of any deficiencies Facilities Management has taken swift corrective action.

Listed below are the audit recommendations and the Department of Transportation and Public Works' response to each item:

1. Work with the recycling vendor and the County's recycling coordinators to document actual weight or a reasonable estimate of the County's recyclables.

In early 2008, it was determined in Facilities Management buildings that through mixed paper and cardboard collection, as well as shredding, that 627 tons of paper products were recycled. This was done by assembling past invoices and calling current and previous vendors; the information was extremely difficult to compile due to the number of changes in vendor over the past several years. It was in early 2009 when an attempt to update this number and include glass, plastic and metal quantities where concerns were identified within this audit.

DTPW agrees with this recommendation. The hiring of the Sustainability & Environmental Engineer will allow the Department and County to address this issue by establishing a regular reporting process for all recycling materials quantities. Tracking of these numbers will be with the intent of assembling them for future information.

In the case where, based on volume, pick up frequency needs to be adjusted; buildings under DTPW jurisdiction have made adjustments to their pick-up schedules by switching to a call in basis rather than scheduled service. In any bid process for Countywide service this will be addressed.

2. Work with recycling coordinators to provide clearly marked recycling bins for all major trash collection points.

A review will be conducted of major trash collection sites. In some cases, the proper grouping of receptacles may be needed, in others, proper labeling or signage. All public space areas will be a priority. In all cases, the availability of three separate collection bins, one for bottles and cans, one for newspaper, and one for trash, will be consistent for building under the jurisdiction oversight.

3. To improve County employee recycling, provide recycling bins for all County departments, and require their use.

Recycling receptacles are currently available in every Departmental area. DTPW agrees that Milwaukee County Department Heads and employees should be doing a better in its recycling effort.

DTPW will also begin the process of purchasing additional recycling bins for its buildings as budgetary dollars allow.

4. Work with recycling coordinators to ensure all County locations have the necessary recycling dumpsters to collect commingled recyclables.

DTPW agrees with this recommendation. The Sustainability & Environmental Engineer and the recycling coordinators will work together to ensure all County locations meet their recycling obligation. The Sustainability & Environmental Engineer will develop a standard for each area based on square footage and occupancy.

Facilities Management took immediate action to have co-mingled bottle, plastic and can dumpsters placed after determining trash was not being sorted. Some buildings, such as the Medical Examiner, generate small enough volumes of paper and cardboard, so that these recyclables can be moved the short distance to the Courthouse/CJF dock dumpsters.

5. Work with the recycling coordinators to establish and communicate recycling procedures relating to disposal of batteries.

DTPW agrees with this recommendation. There have already been discussions on identifying collection points and disposal procedures to properly handle all batteries, particularly small store bought batteries. The Sustainability & Environmental Engineer will develop a policy for such disposal.

6. Work with the Procurement Division to initiate a competitive bid process for the Countywide hauling of commingled recyclables.

DTPW strongly agrees to this recommendation. In working with Procurement to establish Countywide hauling of all recyclables, DTPW can establish a clear line of accountability to the vendor. While DTPW will work with Procurement to establish a Countywide vendor, each department will be billed under a separate account.

7. Have the Sustainability & Environmental Engineer be responsible for approving related invoices.

DTPW agrees that the Sustainability & Environmental Engineer should be involved in the drafting of the competitive bid process for the Countywide hauling of commingled recyclables. It is the intent that this position should also be instrumental in reviewing the recycling program and metrics of the program.

DTPW respectfully asks that this recommendation be reviewed or possibly be redefined to have individual departments involvement in the entire process that leads to invoices. The approving of invoices can be left to Department Heads. The Sustainability & Environmental Engineer shall review invoices to alert Department Heads of any anomalies.

8. Cross-charge departments and other entities for pick-up services provided.

DTPW respectfully asks that this recommendation be reviewed or possibly be redefined. The approving of pick-ups and signing off on invoices to be paid can be left to Department Heads.

This could result in overwhelming one particular Department in both the review of invoices and ensuring the County is actually receiving the service we are paying for.

9. Request detailed invoices for prior years to determine the extent to which the County has been billed improperly for pick-up service.

DTPW agrees with this recommendation. Facilities Management began the request for such details in early 2009. Several contacts were made with vendors. In light of the audit, these requests for detail in the billing were put on hold, so as not to hinder the Department of Audit communications with Vendors. DTPW will resume with its inquiries.

10. Evaluate the economic feasibility of separating high quality white paper from other lower quality paper on a Countywide basis.

DTPW agrees with this recommendation. DTPW will have the Sustainability & Environmental Engineer work with the recycling coordinators to determine the feasibility of placing carts in each Department to separate high and low paper

qualities. However, DTPW does question whether or not it can be done in a cost effective manner.

11. Work with the Department of Human Services to develop alternative tasks for unpaid, non-County staff that currently shred confidential files for recycling purposes.

DTPW does not, and has not, used non-County staff to shred confidential materials. In light of past media exposure, DTPW is concerned about the access that non-county employees have to confidential information and thus uses County staff for security reasons. All shredding is performed by Shredding Solutions and is supervised by a County employee, as per County-wide Price Agreement.

12. Develop, for County Board consideration, an environmental policy or mission statement committing Milwaukee County to recycling and preventing waste.

The Sustainability & Environmental Engineer, currently working within the Architectural and Engineering Division of DTPW, will develop an environmental policy or mission statement committing Milwaukee County to recycling and preventing waste.

13. Develop, for County Board consideration, a strategic County-wide recycling plan, complete with policies and procedures for required management and employee involvement, to provide consistency in the manner in which recyclable items are handled for all County locations.

The Sustainability & Environmental Engineer will also develop a strategic Countywide recycling plan, complete with policies and procedures for required management and employee involvement. This will provide consistency in the manner in which recyclable items are handled for all County locations.

Respectfully submitted,



Jack H. Takerian, Interim Director
Department of Transportation & Public Works